

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NORTH CAROLINA  
SOUTHERN DIVISION

No. 7:23-CV-897

IN RE: )  
)  
CAMP LEJEUNE )  
WATER LITIGATION )  
)  
This Document Relates to: )  
ALL CASES )  
)

**DECLARATION OF  
JAMES FRANKLIN KEY, II**

I, James Franklin Key, II, declare as follows:

1. I am a citizen and resident of Durham, North Carolina.
2. I am over the age of 18 years and suffer from no mental disability. I am competent to testify concerning the matters stated herein, and the statements contained in this Declaration are based upon my personal knowledge.
3. I am the son of James Franklin Key, Sr. and Patricia Kay Key.
4. My father enlisted in the United States Navy in 1958 and served on active duty as a Navy Corpsman until 1963. He thereafter continued to serve in the Navy Reserves until 1979. Attached as Exhibit A is a true and correct copy of my father's military record of service.
5. My parents were married on July 23, 1960.
6. My father and mother lived on Camp Lejeune for approximately two years from July 1961 until July 1963.

7. After being discharged from active duty, my father moved to Durham, North Carolina with my mother where he eventually became one of the first physician assistants licensed in the United States. At the time of his retirement, my father was the Director of the Radiology Department at the Durham Veterans Administration facility.

8. Unfortunately, my father's service at Camp Lejeune resulted in both he and my mother developing life-altering and eventually life-ending illnesses. My mother suffered from non-Hodgkin's lymphoma and an autoimmune disorder, and my father suffered from Parkinson's.

9. My mother died on March 31, 2022. Attached as Exhibit B is a true and correct copy of her death certificate.

10. At the time of my mother's death, my father required substantial care and attention, which was primarily provided in my home (with the exception of required hospitalizations). In addition to all of the Parkinson's related issues, my father also experienced significant grief and depression as a result of my mother's death. My father was named as executor in my mother's will, but it took quite some time before it was appropriate and feasible for him to participate in the tasks necessary to get him qualified as executor. As a result of all of these circumstances, he was not appointed to serve as the legal representative for my mother's estate until May 5, 2023. Attached as Exhibit C is a true and accurate copy of his letters of appointment.

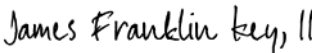
11. In the time period between my mother's death and the formal opening of my mother's estate, a Camp Lejeune Justice Act administrative claim was filed with the Department of Navy for my mother on August 10, 2022.

12. Unfortunately, my father succumbed to complications from Parkinsons and died on January 21, 2024.

13. On April 18, 2024, my sister and I were appointed as co-executors of our mother's estate. Attached as Exhibit D is a true and accurate copy of our letters of appointment.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed: 4/18/2024 | 06:30:01 PDT

DocuSigned by:  
  
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James Franklin Key, II